

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION,  
OPIATE LITIGATION**

**MDL NO. 2804**

**Case No. 17-MD-2804**

**Judge Dan Aaron Polster**

**THIS DOCUMENT RELATES TO:**

*Rees v. McKesson Corporation, et al.*  
MDL Case #1:18-OP-45252

*Ellis v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45464

*Simonson v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45479

*Wood v. Purdue Pharma L.P., et al.*  
MDL Case #1:18-OP-45264

*DeMaro v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45465

*Delancey v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45480

*Salmons v. Purdue Pharma L.P., et al.*  
MDL Case #1:18-OP-45268;

*Cruz v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45466

*Stewart v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45481

*Ambrosio v. Purdue Pharma L.P., et al.*  
MDL Case #1:18-OP-45375

*Paul v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45467

*Shenmake v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45482

*Flanagan v. Purdue Pharma L.P., et al.*  
MDL Case #1:18-OP-45405

*Lechuga v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45468

*Weatherwax v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45483

*Whitley v. Purdue Pharma L.P., et al.*  
MDL Case #1:18-OP-45598

*Brumbarger v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45469

*Martinez v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45484

*Roach v. McKesson Corporation, et al.*  
MDL Case No. #1:18-OP-45662

*Means v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45470

*Warren v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45486

*Hunt v. Purdue Pharma L.P., et al.*  
MDL Case No. #1:18-OP-45681

*Peterson v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45472

*Carlson v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45487

*Hanlon v. Purdue Pharma L.P., et al.*  
MDL Case No. #1:19-op-45052

*Hampel v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45473

*Flach v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45488

*Doyle v. Purdue Pharma L.P., et al.*  
MDL Case No. #1:18-op-46327

*Whittaker v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45475

*Ivie v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45489

*Moore v. Purdue Pharma L.P., et al.*  
MDL Case No. #1:18-op-46305

*Tuttle v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45476

*Cherry v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45490

*Artz v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45459

*Hamawi v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45477

*Ortiz v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45492

*Rodriguez v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45463

*Gauthier v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45478

*Meinecke v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45493

*Brant v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45494

*Williams, v. Purdue Pharma, L.P., et al.*  
MDL Case No. #1:19-op-45485

**MOTION FOR LEAVE TO FILE PLAINTIFFS' MOTION TO EXTEND TIME TO FILE AMENDED**  
**CLASS ACTION COMPLAINTS FOR GOOD CAUSE SHOWN**  
**RENEWED MOTION**

Plaintiffs, through the undersigned, respectfully move for leave to file a Motion to Extend time to file Amended Class Action Complaints. Despite finally being granted access to discovery, some of which is necessary to properly frame class arguments, and despite making concerted efforts to weed through the millions of pages, plaintiffs for the reasons stated in the accompanying motion need more time so they are not unduly prejudiced. Plaintiff NAS Babies made multiple requests over past 18 months for inclusion and were thwarted, however, now that access has been granted it takes more than a mere 2 months to obtain the target information we seek.

For all of these reasons, Plaintiffs' motion for leave should be granted.

Dated: September 14, 2019

Respectfully submitted,

/s/ Scott R. Bickford

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/s/ Donald Creadore

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**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed via the Court's electronic filing system on September 14, 2019. Notice of this filing will be sent by e-mail through the Court's electronic case-filing system to all counsel of record.

/s/Scott R. Bickford  
SCOTT R. BICKFORD